

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

<p>Tarah Fleischman, as Parent and Guardian of C.F., a minor, and in her own right,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>FOREST TRAIL ACADEMY, LLC, ATLANTIS LEADERSHIP ACADEMY, LLC, RANDALL COOK, LISA COOK, UNITED SECURE YOUTH TRANSPORT AGENCY, LLC, DEBBIE CELANI, and TEEN SENTINEL, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION NO. 9:24-cv-81457</p> <p>JURY TRIAL DEMANDED</p>
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PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO SERVE PROCESS

Plaintiff, Tarah Fleischman, as Parent and Guardian of C.F., a minor, by and through undersigned counsel, moves this Court for entry of an order extending the time within which to serve the Amended Complaint on the Defendants, Randall Cook and Lisa Cook, and as good cause states:

1. The Complaint in this lawsuit was filed with the Clerk on 11/21/2024.
2. The Summons for Defendants, Randall Cook and Lisa Cook, were issued on 12/16/2024.
3. Defendants, Randall Cook and Lisa Cook, were served on 1/13/2025.
4. Pursuant to the Court's Order on 05/07/2025, an Amended Complaint in this lawsuit was filed with the Clerk on 05/12/2025.

5. At this time, despite diligent effort, Plaintiffs have not been able to locate and serve Defendants Randall Cook and Lisa Cook with the Summonses and Amended Complaint in this matter.
6. Plaintiffs have attempted to serve Randall Cook and Lisa Cook at 5310 Howard Land, Nampa, ID 83687 (the same address Plaintiff served the original Complaint), multiple times, unfortunately, no one has answered the door during any of these attempts, and it appears as though Defendants may be evading service.
7. Plaintiff previously filed a Motion for Alternative Service, which the Court denied. Therefore, Plaintiff continues to pursue personal service despite Defendants' apparent attempts to evade service.
8. No party will be prejudiced by the Court's granting Plaintiff additional time to locate and serve Defendants Randall Cook and Lisa Cook.
9. Due to the ongoing difficulty and Defendants' apparent evasion, Plaintiff respectfully requests an additional 120 days, although Plaintiff acknowledges the Court may not grant the full amount requested.
10. Pursuant to the Court's order dated 05/07/2025, Plaintiff also respectfully requests an extension of time to file a Motion for Default Judgment against Randall Cook and Lisa Cook until 20 days after service of process is effectuated on both parties.

WHEREFORE, for the foregoing reasons, the Plaintiff moves this Court for entry of an order granting them an additional **120 days** within which to serve Defendants **Randall Cook and Lisa Cook** with the Amended Complaint and related pleadings in this case.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing has been furnished by electronic filing with the Clerk of the court via CM.ECF, which will send notice of electronic filing to all counsel of record on September 9, 2025.

THE HAGGARD LAW FIRM, PA

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